

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

TEHUM CARE SERVICES, INC.,<sup>1</sup>

Case No. 23-90086-CML  
Chapter 11

Debtor.

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**LIMITED OBJECTION OF  
CHAPMAN LAW GROUP TO CONFIRMATION OF PLAN**

Chapman and Associates, P.C., d/b/a Chapman Law Group by and through its counsel, Schafer and Weiner, PLLC, hereby objects to the *Joint Chapter 11 Plan of the Tort Claimants' Committee, Official Committee of Unsecured Creditors and Debtor* [DN 1815], and states as follows:

1. Chapman Law Group ("Chapman") is a pre-petition creditor of Debtor. See Proof of Claim No. 41.
2. Post Petition Chapman initiated litigation against YesCare Corp ("YesCare") and others in the United States District Court for the Eastern District of Michigan (Case No. 2:23-cv-11210).
3. In August 2024, Chapman and YesCare entered into a Confidential Settlement and Release (the "Settlement Agreement") and dismissed the action pending in the Eastern District of Michigan.

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<sup>1</sup> The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

4. Without disclosing the terms of the Settlement Agreement, the Settlement Agreement is arguably inconsistent with the broad release granted to YesCare under the Plan.

5. To the extent that the broad release under the Plan is inconsistent with the Settlement Agreement, Chapman objects.

**WHEREFORE**, Chapman and Associates, P.C., d/b/a Chapman Law Group hereby requests that this Court exclude YesCare's obligation under the Settlement Agreement from any release granted under the Plan.

Respectfully submitted,

SCHAFER AND WEINER, PLLC

/ s / Howard M. Borin  
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Dated: February 21, 2025